

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Re: Docket Nos. 1048, 1156 & 1245

**CERTIFICATION OF COUNSEL REGARDING
MOTION OF THE DEBTORS FOR ENTRY OF AN ORDER, PURSUANT TO
SECTIONS 105 AND 363 OF THE BANKRUPTCY CODE, BANKRUPTCY RULE 6004,
AND LOCAL RULE 6004-1, AUTHORIZING THE SALE OF CERTAIN ASSETS
FREE AND CLEAR OF ALL LIENS, CLAIMS, INTERESTS, AND ENCUMBRANCES**

The undersigned counsel to Joann inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On May 30, 2025, the *Motion of the Debtors for Entry of an Order, Pursuant to Sections 105 and 363 of the Bankruptcy Code, Bankruptcy Rule 6004, and Local Rule 6004-1, Authorizing the Sale of Certain Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances* [Docket No. 1048] (the “Motion”) was filed with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Motion (the “Proposed Order”), a copy of which is reattached hereto as **Exhibit 1**.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

2. Pursuant to the Notice of Motion, objections or responses to the Motion were to be filed and served on undersigned counsel by June 13, 2025, at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”).

3. Prior to the Objection Deadline, the Official Committee of Unsecured Creditors (the “Committee”) filed the *Limited Objection of the Official Committee of Unsecured Creditors to Debtors’ Sale Motion* [Docket No. 1156] (the “Objection”).

4. The Debtors did not receive any other objections or informal comments to the Motion or Proposed Order.

5. The Debtors have addressed the Committee’s Objection and resolved their concerns. The Committee withdrew its Objection and does not object to entry of the Proposed Order.

6. The Debtors respectfully request that the Court enter the Proposed Order at its earliest convenience.

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Dated: June 23, 2025
Wilmington, Delaware

/s/ Patrick J. Reilley

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